

1 LEWIS BRISBOIS BISGAARD & SMITH LLP  
STEPHEN H. TURNER, SB# 89627

2 E-Mail: [Stephen.Turner@lewisbrisbois.com](mailto:Stephen.Turner@lewisbrisbois.com)

LARISSA G. NEFULDA, SB# 201903

3 E-Mail: [Larissa.Nefulda@lewisbrisbois.com](mailto:Larissa.Nefulda@lewisbrisbois.com)

633 West 5<sup>th</sup> Street, Ste. 4000

4 Los Angeles, CA 90071

Telephone: 213.250.1800

5 Facsimile: 213.250.7900

6 Attorneys for Defendants  
GOLDSMITH & HULL, APC and  
7 WILLIAM I. GOLDSMITH

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

11 POVILAS KARCAUSKAS, on behalf  
12 of himself and all others similarly  
situated,

13 Plaintiff,

14 vs.

15 REGRESO FINANCIAL SERVICES  
16 LLC; GOLDSMITH & HULL, APC;  
17 WILLIAM I. GOLDSMITH; and  
DOES 1 to 10;

18 Defendants.

CASE NO. 2:15-cv-09225-FMO-RAOx

**STIPULATION TO ALLOW  
DEFENDANTS TO FILE A  
SECOND AMENDED ANSWER TO  
PLAINTIFF'S COMPLAINT**

Trial Date: March 21, 2017

[Hon. Fernando M. Olguin]

21 IT IS HEREBY STIPULATED between Plaintiff POVILAS KARCAUSKAS  
22 ("Plaintiff") and Defendants GOLDSMITH & HULL, APC and WILLIAM I.  
23 GOLDSMITH (collectively "Defendants"), as follows:

24 WHEREAS, on March 16, 2016, Defendants filed a First Amended Answer  
25 to Plaintiff's Complaint. The First Amended Answer included a single affirmative  
26 defense: the bona fide error defense.

27 WHEREAS, after the First Amended Answer was filed, the parties met and  
28 conferred regarding Plaintiff's claim that Defendants' bona fide error defense should

4847-3097-6815.1

1 be stricken or amended to properly state such defense. Defendants have agreed to  
2 file a Second Amended Answer.

3 WHEREAS, pursuant to the Court's March 15, 2016 Order, the last date for  
4 Plaintiff to file a Motion to Strike Defendants' affirmative defense is April 6, 2016.

5 WHEREAS, on March 29, 2016, Defendants sent their proposed Second  
6 Amended Answer to Plaintiff.

7 WHEREAS, on April 4, 2016, Plaintiff advised Defendants that he stipulates  
8 to the filing of the proposed Second Amended Answer.

9 WHEREAS, the Court's March 11, 2016 Amended Scheduling And Case  
10 Management Order provides that any stipulation or motion to amend as to any  
11 claims, defenses and/or parties shall be lodged/filed no later than May 6, 2016;

12 WHEREAS, a copy of Defendants' proposed Second Amended Answer to  
13 Plaintiff's Complaint is attached hereto as Exhibit 1;

14 WHEREAS, Plaintiff reserves his right to file a motion to strike the bona fide  
15 error defense within 21 days of the date Defendants file their Second Amended  
16 Answer.

17 NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN  
18 THE PARTIES that Defendants should be permitted leave to file their Second  
19 Amended Answer to Plaintiff's Complaint.

20  
21 DATED: April 4, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

22  
23 By: /s/ Larissa G. Nefulda

24 Stephen H. Turner

Larissa G. Nefulda

25 Attorneys for Defendants

26 GOLDSMITH & HULL, APC and  
27 WILLIAM I. GOLDSMITH

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DATED: April 4, 2016

CONSUMER LAW OFFICE OF  
ROBERT STEMPLER, APC

By:           /s/ Robert Stempler            
Robert Stempler  
Attorneys for Plaintiff  
POVILAS KARCAUSKAS

DATED: April 4, 2016

HORWITZ, HORWITZ & ASSOCIATES

By:           /s/ O. Randolph Bragg            
O. Randolph Bragg  
Attorneys for Plaintiff  
POVILAS KARCAUSKAS